176799 SA

ELLIOTT & ELLIOTT, P.A.

#### ATTORNEYS AT LAW

721 OLIVE STREET
COLUMBIA, SOUTH CAROLINA 29205
selliott@elliottlaw.us



SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

November 17, 2005

HAND DELIVERY

Charles L. A. Terreni, Esquire Chief Clerk and Administrator South Carolina Public Service Commission 101 Executive Center Drive Columbia, S.C. 29210

RE:

In the Matter of the Application of Sprint Long Distance, Inc.

Docket No. 2005-238-C

Dear Mr. Terreni:

Enclosed please find for filing the original and twenty-five (25) copies of the verified Supplemental Direct Testimony with one exhibit of C. Steve Parrott on behalf of Sprint Long Distance, Inc. in the above-captioned matter. Please return one clocked copy to me via my courier. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/mlw

**Enclosures** 

c: All Parties of Record w/enc.

IN RE: APPLICATION OF SPRINT LONG
DISTANCE, INC. FOR A CERTIFICATE OF
PUBLIC CONVENIENCE AND NECESSITY
TO PROVIDE INTRASTATE RESOLD
TELECOMMUNICATIONS SERVICES, FOR
ALTERNATIVE REGULATION, AND
WAIVER OF CERTAIN COMMISSION
RULES

SUPPLEMENTAL DIRECT TESTIMONY

PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-238-C

DOCKET NO. 2005-238-C

**OF** 

C. STEVE PARROTT

ON BEHALF OF

SPRINT LONG DISTANCE, INC.

November 17, 2005

- Q. Please state your name and business address.
- 2 A. My name is C. Steve Parrott and my business address is 14111 Capital
- Boulevard, Wake Forest, North Carolina, 27587-5900.

4

1

- 5 Q. By whom are you employed and what is your position?
- 6 A. I am employed by Sprint/United Management Company as State Executive
- 7 for North Carolina and South Carolina and I am testifying in this proceeding
- 8 on behalf of Sprint Long Distance, Inc.

9

10

- Q. Please briefly outline your education, training and experience in the telephone industry.
- 12 A. I hold a Bachelor of Science Degree in Business Administration (Accounting
- Major) from the University of Tennessee at Knoxville and I have over twenty-
- eight (28) years of telephony experience with Sprint Corporation. Following
- my employment with Sprint's regional local exchange company in Bristol,
- Tennessee in July 1977 as a staff accountant, I have held numerous staff
- and management positions in the areas of finance/accounting, information
- management services, and regulatory affairs. Management positions have
- 19 included General Accounting Manager, Director Local Revenues, Director -
- 20 Rate Planning and Rate Case Matters, Director Revenues and Regulatory
- 21 Matters, Director Regulatory Affairs TN/VA and Director-State Regulatory
- 22 Affairs. In November 2000, I was appointed to my present position of State
- 23 Executive-NC/SC.

#### Q. What are your responsibilities as State Executive - NC/SC?

2 A. I am directly responsible for state regulatory affairs and governmental affairs 3 work functions for all Sprint affiliates (including United Telephone Company 4 of the Carolinas) in North Carolina and South Carolina, as well as for Sprint's 5 local communications and public affairs functions in these states. Although I 6 am not an attorney, I do have indirect responsibility for the legal (regulatory) 7 functions in these states. As State Executive-NC/SC, I direct Sprint's 8 external affairs activities in North Carolina and South Carolina, which 9 includes providing regulatory and legislative advocacy for Sprint's affiliates in 10 these states.

11

12

1

#### Q. Have you previously testified before state utility Commissions?

A. Yes, I have testified before the North Carolina Utilities Commission, the
Tennessee Regulatory Authority (previously the Tennessee Public Service
Commission), the Virginia State Corporation Commission and the Public
Service Commission of South Carolina addressing the areas of
finance/accounting, rate design, access charge reform, regulatory policy,
price regulation plans, rules for local exchange competition and universal
service issues.

20 21

22

23

24

#### Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support the fact that the approval of Sprint Long Distance, Inc.'s ("SLDI") Application is in the public interest, and that SLDI has the financial, managerial and technical capabilities to operate as a

reseller of intrastate long distance services in South Carolina. I will also explain why SLDI is seeking a waiver of certain Commission rules.

#### Q. Why would approving this Application be in the public interest?

A. Approval of SLDI's Application will benefit consumers in South Carolina by creating greater competition in the interexchange marketplace and by providing users with additional choices for billing and terminating their long distance calls. Additionally, approval of the Application serves the public interest by making discounted intrastate interexchange service available to customers whose traffic volumes would not otherwise warrant equivalent discounts.

## Q. Has any party to this proceeding asserted that approval of SLDI's Application is not in the public interest?

A. No. After filing all public notices as required by the Commission rules, only the Office of Regulatory Staff ("ORS") intervened. Pursuant to S.C. Code Ann. Section 58-4-10 as enacted by 2004 S.C. Acts 175, the ORS is a party of record in all filings, applications, and proceedings before the Public Service Commission of South Carolina. By this same statute, ORS is charged with representing the public interest of South Carolina before the Commission. As demonstrated by SLDI's and ORS's request for approval of SLDI's Application, filed on November 3, 2005, the ORS agrees that approval of this Application is in the public interest.

2	distance?
3	A.Yes. As a subsidiary of Sprint Nextel Corporation (f/k/a Sprint Corporation),
4	Sprint Long Distance, Inc. has access to capital resources as well as banking
5	relationships that will permit it to provide the services requested in this
6	application. In Exhibit D of the Application, SLDI provided the most recent 10k
7	of Sprint Corporation to show the financial wherewithal of SLDI and its
8	affiliates. Specifically, on page 24 of the 10K, "Item 6: Selected Financial data
9	it shows Net cash from operating activities—continuing operations of \$6.625
10	billion for the year 2004, an increase of \$110 million over 2003.
11	
12	Q. Does SLDI have the managerial expertise to operate as a reseller of long
13	distance?
14	A. Yes. I have attached Exhibit E from SLDI's Application filed on August 10,
15	2005, to my testimony as Exhibit A. This Exhibit gives a brief history of each
16	of the directors of SLDI. As can be seen from the Exhibit, the directors of
17	SLDI have the experience and depth to run a long distance reseller.
18	
19	The senior manager of SLDI is Michael B. Fuller. Mr. Fuller, currently
20	President and Chief Operating Officer of Sprint's Local Telecommunications
21	Division, has had responsibility for leading Sprint's local telephone operations
22	since 1996. Prior to his current position, Fuller served as president of

Q. Does SLDI have the financial abilities to operate as a reseller of long

1		Western Operations in Sprint's local telephone operations, a position he was
2		appointed to in July 1996. Before that, he was president of Sprint/United
3		Telephone-Midwest for six years.
4		
5		From 1983 to 1988, Fuller held key management positions in United
6		Telecommunications, Inc.'s long distance business. He served as vice
7		president-planning for ISACOMM in 1983 and as senior vice president-
8		administration and planning for US Telecom in 1984. With the formation of US
9		Sprint in 1986, he became president of the company's Southeast Division,
10		based in Atlanta. He later became senior vice president-planning
11		development and international services in 1987. He was named executive
12		vice president-staff in 1988. Fuller rejoined the Local Telecommunications
13		Division in 1989 as president, United Telephone of the Northwest.
14		
15	Q.	Does SLDI have the technical expertise to operate as a reseller of long
16		distance?
17	A.	Yes. SLDI will be a reseller of Sprint Communications Company L.P., but will
18		be using its own branding and price points for marketing purposes. Calls will
19		be routed over Sprint Communications Company L.P.'s extensive network
20		facilities. Sprint Communications Company L.P. is certificated by the Public
21		Service Commission of South Carolina as a facilities-based interexchange
22		carrier.
23		

1	Q. Is SLDI aware of the rules and regulations of the Public Service
2	Commission of South Carolina?
3	A. Yes. The Commission's rules and regulations are well known to both SLDI
4	and Sprint Communications Company L.P., an affiliate of SLDI, which has
5	been operating in South Carolina for many years.
6	
7	Q. What other regulatory relief and waivers is SLDI seeking in its
8	Application?
9	A. First, SLDI should be subject to no greater regulatory constraints than those
10	imposed by the Commission on AT&T Communications of the Southern
11	States ("AT&T"), a potential competitor of SLDI. In Docket No. 95-661-C, the
12	Commission previously granted a Petition for alternative regulation filed by
13	AT&T, finding that there was sufficient competition for interexchange
14	telecommunications services in South Carolina to justify a relaxed form of
15	regulation for AT&T's business offerings. SLDI seeks the same relaxed
16	regulation as obtained by AT&T in the above-referenced docket.
17	
18	Second, SLDI requests that the Commission grant a waiver of any
19	Commission rule that would require it to maintain its books under the Uniform
20	System of Accounts. Because Sprint Long Distance, Inc. currently maintains
21	its books and records in accordance with Generally Accepted Accounting
22	Principles, or GAAP, it would constitute a burden for SLDI to maintain two
23	sets of records.

1	Third, SLDI requests a waiver of 26 S.C. Code Regs. Section 103-610
2	("Location of Records and Reports") in order that SLDI may be allowed to
3	maintain its books and records outside South Carolina, i.e., at its operational
4 5 6	headquarters located in Overland Park, Kansas.
7	Q. How does the proposed transfer of control of United Telephone
8	Company of the Carolinas from Sprint Nextel to LTD Holding Company
9	affect SLDI?
10	A. Upon approval of the transfer of control of United Telephone Company of the
11	Carolinas ("United") and SLDI from Sprint Nextel to LTD Holding Company,
12	SLDI will become the long distance arm of LTD Holding Company. This is a
13	very important piece of the marketing plan and furthers the public interest by
14	enabling United to continue to offer bundled services under a single brand
15	and via a single monthly bill to customers.
16	
17	From a financial perspective, after the transfer of control, the new financial
18	backer of SLDI, LTD Holding Company, will be a Fortune 500 company and
19	will possess the financial capability to assist SLDI in providing quality service
20	to its customers in South Carolina.
21	
22	Q. Will United's customers who are presubscribed to Sprint
23	Communications Company L.P. be automatically transferred from Sprint
24	L.P. to SLDI?

- 1 A. No, not automatically. Customers located in United of the Carolina's operating
- territory will be given the option to remain with Sprint Communications
- 3 Company L.P. or to switch to SLDI. Customer notice will follow all Federal
- 4 Communications Commission and Public Service Commission of South
- 5 Carolina rules for change of service.

6

- 7 Q. Does this conclude your Direct Testimony?
- 8 A. Yes, it does.

#### BEFORE THE

#### PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In the Matter of the Application of	)	
Sprint Long Distance, Inc.	)	
for a Certificate of Public Convenience	)	Docket No. 2005-238-C
and Necessity to Provide Intrastate Resold	)	
Telecommunications Services, for	)	
Alternative Regulation, and for Waiver of	)	
Certain Commission Rules	)	

### **EXHIBIT A**

#### BEFORE THE

#### SOUTH CAROLINA PUBLIC SERVICE COMMISSION

In the Matter of the Application of	)
Sprint Long Distance, Înc.	)
for a Certificate of Public Convenience	)
and Necessity to Provide Intrastate Resold	)
Telecommunications Services, for	)
Alternative Regulation, and for Waiver of	)
Certain Commission Rules	-

# EXHIBIT E

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 1 of 12

Michael B. Fuller

President and Chief Operating Officer, Local Telecommunications Division

Sprint Corporation

Michael B. Fuller is president and chief operating officer of the Local Telecommunications Division, a role he assumed in October 1996. In this position, he is responsible for leading local telephone operations in 18 states.

Prior to his current position, Fuller served as president of Western Operations in Sprint's local telephone operations, a position he was appointed to in July 1996. Before that, he was president, Sprint/United Telephone-Midwest for six years.

Fuller began his career in 1974 as a financial analyst on United Telecommunication's corporate staff. He subsequently had assignments in operations, international marketing and strategic planning prior to being elected assistant vice president-planning for United's telephone operations in 1981.

From 1983 to 1988, Fuller held key management positions in United's long distance business. He served as vice president-planning for ISACOMM in 1983 and as senior vice president-administration and planning for US Telecom in 1984. With the formation of US Sprint in 1986, he became president of the company's Southeast Division, based in Atlanta. He later became senior vice president-planning development and international services in 1987. He was named executive vice president-staff in 1988. Fuller rejoined the Local Telecommunications Division in 1989 as president, United Telephone of the Northwest.

Fuller holds a bachelor's degree in engineering from the U.S. Military Academy at West Point and a master's degree in business administration from the University of Kansas in Lawrence.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 2 of 12

Gene M. Betts
Senior Vice President and Treasurer
Sprint Corporation

Gene Betts was named senior vice president and treasurer in December 1998. He is presently responsible for Sprint's treasury functions, mergers and acquisitions, taxes, real estate and facilities, corporate financial planning and forecasting, and risk management and loss prevention.

Betts joined Sprint in 1987 as assistant vice president, with responsibility for corporate tax matters and subsequently became vice president in 1988. In 1990, he was named senior vice president, with responsibility for leading finance functions in the Long Distance Division. In 1993, he assumed additional responsibility for corporate financial services, including mergers and acquisitions, financial planning and forecasting, and taxes.

Prior to joining Sprint, Betts was a partner with Arthur Young & Co., one of the predecessor firms to Ernst and Young. He joined Arthur Young in 1975 and held various assignments in the firm's audit and tax departments.

Betts holds a bachelor's and a master's degree in business from the University of Kansas and is a Certified Public Accountant.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 3 of 12

Claudia S. Toussaint Vice President, Corporate Governance and Ethics, and Corporate Secretary Sprint Corporation

Claudia Toussaint is vice president, Corporate Governance and Ethics, and corporate secretary following her appointment to this position in April 2004. Her responsibilities include corporate governance, ethics and compliance, finance and securities, executive compensation and ERISA compliance matters.

Prior to her current role, Toussaint served as vice president-law, Corporate Governance and corporate secretary, an appointment that began in April 2003. She took on the additional responsibility for Sprint's ethics and compliance function in December 2003.

Toussaint joined Sprint in January 1997 and served as an attorney for more than five years before being named assistant vice president-law, Corporate Governance and assistant corporate secretary in 2002.

Before joining Sprint, Toussaint was an associate in the Los Angeles law office of Morrison & Forester LLP.

Toussaint holds a J.D. from the University of California, Hastings College of the Law and a B.A. in Economics from the University of California in Los Angeles.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 4 of 12

Richard B. Green
Vice President – Local Telephone Division Finance
Sprint Corporation

Dick serves as the Vice President - Finance for the Local Telecommunications Division (LTD) in Kansas City. He is responsible for end-to-end decision support functions, including financial planning, economic analysis, budgets and forecasts, marketing and operations support, competitive analysis and divisional financial reporting. He is also responsible for financial leadership, direction and consulting to the executives of the various business units within the LTD.

Since joining Sprint 14 years ago, Dick has advanced through finance assignments in Corporate Financial Accounting, Global Market Group's (GMG) consumer markets business unit; GMG's network and IT organizations; GMG's financial reporting & operations analysis function; and Sprint's Office of Transformation.

Prior to joining Sprint, Dick was a senior manager with Deloitte & Touche's audit practice in Kansas City. His areas of specialty included the airline, manufacturing and education industries. He also worked extensively in the areas of IPOs, leveraged buyouts and other M&A transactions.

Dick is a graduate of Central Missouri State University and is a Certified Public Accountant. He lives in Parkville, Missouri with his wife, Lori.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 5 of 12

Mark V. Beshears

AVP-State/Local Taxes

Sprint Corporation

Mark V. Beshears is currently the Assistant Vice President of State & Local Tax for Sprint Corporation. He is responsible for legislative tax policy, research and planning, compliance and audits for all state and local tax matters. Mr. Beshears has held this position since August of 1992. Mr. Beshears was also the Kansas Secretary of Revenue from January 1991 to August 1992 and Kansas Director of Taxation from 1979 to 1983. He received his undergraduate degree form the University of Missouri, his J. D. degree from Washburn University School of Law and his LL.M. degree in taxation from the University of Missouri-Kansas City. Mr. Beshears' professional experience has been in the areas of sales and use tax litigation and representation of multistate corporations involved in Kansas corporate tax litigation. He also has represented many clients in lobbying efforts before the Kansas Legislature. He is a former director of the Kansas City Chapter of TEI and the Committee on State Taxation where he served as Vice-Chair of the Legislative Sub-Committee. Mr. Beshears is a past President of the Kansas Chamber of Commerce and Industry and is a member of its Tax Committee and Board of Directors.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 6 of 12

GARY E. CHARDE
Vice President - Tax
Sprint Corporation

Gary is Vice President – Tax for Sprint Corporation. In this role, Gary is responsible for all areas of taxation and tax accounting and reporting impacting Sprint and its subsidiaries.

Gary joined Sprint in 1987 as Director – Federal Tax, became Assistant Vice President – Federal Tax in 1990, and was promoted to his current position in 1998. His career at Sprint has included extensive experience in the tax aspects of structuring joint ventures, mergers, acquisitions, and dispositions.

Gary holds a BS in Accounting from the University of Missouri and resides in the Kansas City, Missouri area. Prior to joining Sprint, Gary was with Ernst & Young.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 7 of 12

Michael T. Hyde Assistant Secretary Sprint Corporation

Michael Hyde was elected Assistant Secretary of Sprint Corporation (formerly known as United Telecommunications, Inc.) in 1980. He joined Sprint in 1975 as a member of Sprint's Legal Department.

Mr. Hyde is a member of Sprint's Corporate Secretary group, which is responsible for SEC matters, including periodic and current reporting, corporate financings, strategic initiatives, and board matters.

Mr. Hyde received a Bachelor's Degree from Princeton University, a legal degree from Stanford University, and a MBA from Wharton School, University of Pennsylvania.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 8 of 12

Faye S. Davis
Vice President-Enterprise Property Services
Sprint Corporation

Faye S. Davis is Vice President of Enterprise Property Services for Sprint. Sprint's corporate real estate portfolio consists of over 15 million square feet managed by a staff of 420. Enterprise Property Services provides end-to-end real estate services to the Sprint enterprise including: Customer Relationship Management, Portfolio and Project Planning, Transaction and Project Planning, Site Operations, and Operational Excellence—financial and business process support. In addition to typical real estate services, the EPS organization provides the Sprint enterprise with guard force services, fitness and food center services, records management, output devices, print services, and mail. Sprint's real property portfolio covers office space, data centers, call centers, warehouses, and retail stores. EPS manages all the property rights contracts for the wireline network assets which constitute over 90,000 agreements. EPS was responsible for acquiring and delivering 210 retail stores in 2004. Faye managed the development of Sprint's one billion dollar, four million square foot campus from 1996-2000.

Prior to joining Sprint in 1996, Faye spent five years as the Deputy Commissioner for Mayor Daley in Chicago where she was responsible for transactions and projects for the City of Chicago's real estate. Before that, Faye was Development Manager for Tishman Speyer Properties in Chicago and also spent two years with Price Waterhouse Consulting Firm in Tokyo, Japan.

Faye has an MBA from Columbia Graduate School of Business and a BS degree from the University of North Carolina, Chapel Hill.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 9 of 12

Dennis C. Piper Vice President, Finance and Assistant Treasurer Sprint Corporation

Dennis Piper was appointed Vice President, Finance and Assistant Treasurer for Sprint Corporation in January 1999. In this capacity he has responsibility for all capital market and Treasury operations activity. In September 2003, he assumed responsibility for the Pension Trust as well.

Piper began his Sprint career in 1989 as Assistant Vice President, Operations Analysis for the Long Distance Division. After four years in that role, he served three years as Assistant Vice President, Mergers & Acquisitions in Corporate Finance and two years as Vice President, Finance for Sprint International.

Prior to joining Sprint, Piper spent nearly twelve years in various financial positions with The Pillsbury Company in Minneapolis. He also served five years as a commissioned officer in the U.S. Army.

Piper holds a Bachelor of Science degree in applied science/engineering from the U.S. Military Academy at West Point, NY as well as an MBA in finance from the University of Wisconsin-Madison.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 10 of 12

Brett Haring
General Attorney & Assistant Secretary
Sprint Corporation

Brett Haring has served as General Attorney and Assistant Secretary since February 2003. In this position he provides legal support for Sprint's corporate governance initiatives and activities, for the ongoing operations of the Board and the Nominating and Corporate Governance Committee, and for other corporate matters.

Haring joined Sprint in 1997 as a Senior Attorney, supporting Sprint's international joint venture and merger and acquisition activity. In April 2000, Haring was promoted to General Attorney, and from Fall 2001 to February 2003 he led Sprint's international legal team.

Before joining Sprint in 1997, Haring was a senior attorney with Delta Air Lines in Atlanta. Prior to his work for Delta, Haring was an associate in the St. Louis office of the law firm Bryan Cave LLP.

Haring holds a J.D. from Harvard Law School (1989), an M.A. from Indiana University in History and Germanic Studies, and B.A.s from Nebraska Wesleyan University in History and German.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 11 of 12

Charlie R. Wunsch Vice President, Law-Corporate Transactions Sprint Corporation

Charlie Wunsch was named Vice President of Law-Corporate Transactions in December 2002. His group has enterprise-wide responsibility for legal matters regarding mergers, acquisitions and dispositions of companies and assets, international operations and sales, real estate, procurement and intellectual property.

Previously, he served as assistant vice president of the Intellectual Property Law Group (1999-2002) and the M&A group (2000-02). He also managed the Business Law Group at Sprint PCS during the building of the PCS network (1995-99) and served in the corporate secretary's group (1990-95). Before joining Sprint in 1990, he was a partner in the Kansas City law firm of Watson, Ess, Marshall & Enggas.

Mr. Wunsch holds a bachelor's degree in history from Stanford University and a Juris Doctorate degree from Cornell Law School.

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

Page 12 of 12

Carolyn S. Love Senior Attorney Sprint Corporation

Carolyn S. Love joined Sprint as an Attorney in 1993 as a member of Sprint's Legal Department (Corporate Secretary group). Sue was promoted to Senior Attorney in 1999.

Sprint's Corporate Secretary group is responsible for SEC matters, corporate financings, strategic initiatives, board matters, and SEC periodic and current reporting.

Carolyn S. Love received a Bachelor's Degree from University of Missouri at Kansas City. She received a J.D. from University of Missouri at Kansas City – School of Law.

#### **AFFIDAVIT**

STATE OF _	NC	
COUNTY O	F Franklin	

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared C. Steve Parrott, who being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of Sprint Long Distance, Inc. before the Public Service Commission of South Carolina in Docket No. 2005-238-C, and if present before the Commission and duly sworn, his testimony would be the same as set forth in the annexed Direct Testimony consisting of 8 pages and 1 exhibit(s).

C. Steve Parrott

SWORN TO AND SUBSCRIBED BEFORE ME THIS 120+4 DAY OF 100cmber, 2005.

NOTARY PUBLIC

MY COMMISSION EXPIRES ON 12-28-09

SC PUBLIC AND 2: 2

#### **CERTIFICATE OF SERVICE**

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Application of Sprint Long Distance, Inc. for a Certificate of Public Convenience and Necessity to Provide Intrastate Resold Telecommunications Services, for Alternative Regulation, and for Waiver of Certain Commission Rules

DOCKET NO .:

2005-238-C

PARTIES SERVED:

Wendy B. Cartledge, Esquire

Counsel

Office of Regulatory Staff

PO Box 11263

Columbia, SC 29211

PLEADING:

SUPPLEMENTAL DIRECT TESTIMONY OF

C. STEVE PARROTT

November 17, 2005

Marcia H. Halters